

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

In re: :
:

KELI JO HARPER, : Case No: 15-32763
: Chapter 13

Debtor. :
:

RESPONSE TO OBJECTION TO CLAIM AND REQUEST FOR HEARING

Creditor Arthur Mark Harper, by counsel, objects to Debtor's Objection to Claim 3-1 and requests a hearing. The issue of whether Arthur Mark Harper holds a nondischargeable Domestic Support Obligation claim entitled to priority (or a nondischargeable student loan claim) will be determined by the court in Arthur Mark Harper v. Keli Jo Harper, Adversary Proceeding Number 15-3369 currently pending in this court, the outcome of which should take precedence over and resolve the issue in this contested matter, and the ultimate feasibility of Debtor's chapter 13 plan and case.

ARTHUR MARK HARPER
By Counsel

Date: July 8, 2015

/s/James H. Wilson, Jr.
James H. Wilson, Jr.
Counsel for Plaintiff
VSB No: 27878
4860 Cox Road, Suite 200
Glen Allen, VA 23060
(804) 740-6464

PROOF OF SERVICE

I certify that I have this 8th day of July, 2015, mailed or hand-delivered a true copy of the foregoing Response and Request on the following parties:

Suzanne E. Wade, Chapter 13 Trustee
P. O. Box 1780
Richmond, VA 23218-1780

Barry Spear, Esq.
Boleman Law Firm, P.C.
P.O. Box 11588
Richmond, VA 23230-1588

/s/ James H. Wilson, Jr.
James H. Wilson, Jr., VSB No: 27878
Counsel for Plaintiff